

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

LANA SUE HANSON, RICHARD A.
HANSON, JANE WILJAMAA, ALAN
WILJAMAA, on their own behalves and
on behalf of a class of similarly situated
participants and beneficiaries, and JAMES
ENGLAND, DEBRA M. ENGLAND,
GERALD B. MANNINEN, RITA P.
MANNINEN, MICHAEL MURPHY,
PAMELA S. MURPHY, PHYLLIS
SODERBERG, ROBERT SODERBERG,
KENNETH STUHR AND CONSUELO
STUHR,

Plaintiff,

vs.

GENERAL DYNAMICS
CORPORATION, GENERAL
DYNAMICS SALARIED RETIREMENT
PLAN; GENERAL DYNAMICS
CORPORATION RETIREMENT PLAN;
ALIGHT SOLUTIONS (FORMERLY
KNOWN AS HEWITT ASSOCIATES
LLC),

Defendants.

DEFENDANTS' MOTION TO DISMISS

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants General Dynamics Corporation, General Dynamics Salaried Retirement Plan, General Dynamics Corporation Retirement Plan, and Alight Solutions (Defendants) respectfully move to dismiss with prejudice all claims asserted in the Complaint (ECF No. 1) for failure to state a claim upon which relief can be granted. In support of this Motion, Defendants

Case No. 21-cv-01122-PAM-ECW

submit the accompanying Memorandum, declaration of Amanda MacPhail, and exhibits attached thereto.

Dated: September 10, 2021

By /s/ Stephen P. Lucke
Stephen P. Lucke (#0154210)
lucke.steve@dorsey.com
Alan Iverson (#0399747)
iverson.alan@dorsey.com
DORSEY & WHITNEY LLP
50 South Sixth Street, Suite 1500
Minneapolis, MN 55402
Telephone: (612) 340-2600
Facsimile: (612) 340-2868

Joseph J. Torres*
jtorres@jenner.com
Wade A. Thomson*
wthomson@jenner.com
Jennifer T. Beach*
Jbeach@jenner.com
Alexis E. Bates*
abates@jenner.com
(*Admitted pro hac vice)
JENNER & BLOCK LLP
353 N. Clark St.
Chicago, IL 60654-3456
Telephone: (312) 222-9350
Facsimile: (312) 527-0484

Attorneys for Defendants General Dynamics Corporation, General Dynamics Salaried Retirement Plan, General Dynamics Corporation Retirement Plan, and Alight Solutions (formerly known as Hewitt Associates LLC)